



NEOEN

Numurkah Solar Farm

Application for Generation Licence

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1. Introduction

This application is prepared in accordance with the Guidance Notes for Applications for Electricity Licences and the Transfer of Existing Electricity licences published by the Essential Services Commission (November 2006). Numurkah Solar Farm Pty Ltd (**NSF P/L**) is applying for a licence to generate, supply and sell electricity within the state of Victoria.

2. The Applicant and Nature of the Application

2.1 Project Overview

Numurkah Solar Farm (the **Project** or **NSF**) has been developed by Neoen Australia Pty Ltd and is currently under construction. NSF P/L has entered into an engineering, procurement and construction (EPC) contract with Downer Utilities Australia Pty Ltd (**Downer Utilities**) for the construction of the Project which commenced in August 2018. NSF is located approximately 220km north of Melbourne Victoria.

The Numurkah Solar Farm will have a total capacity of 128 MW(dc), consisting of 373,839 modules (panels) installed over approximately 515 hectares of land. NSF will connect into Powercor's 66kV distribution network cutting into the existing SHTS-NKA line. The total output will be capped at 100MW.

The purpose of the Numurkah Solar Farm is to export electricity generated by the solar farm to the National Electricity Market Grid via the Point of Connection. A portion of the electricity generated by NSF will be sold under an offtake arrangement with Liberty GREENPOWER (Simec Zen).

The project is expected to commence generating electricity in March 2019.

Neoen Australia operates a fleet of generation assets within the National Electricity Market (NEM) including five solar farms in NSW, a wind farm (three stages) and grid scale battery in South Australia. Each stage of Neoen's Hornsdale Wind Farm along with the adjacent 100MW battery, the Hornsdale Power Reserve, hold separate generation licences with the Essential Services Commission of South Australia (ESCOSA).

All planning and environmental approvals for the Numurkah Solar Farm have been received.

- Attachment 2.1 Numurkah Solar Farm Amended Planning Permit, Moira Shire Council

2.2 Information on the Applicant and Nature of the Application

Name of Applicant	Numurkah Solar Farm Pty Ltd
ACN	618 524 422
Date of Incorporation	12 th of April, 2017
Registered Address	Suite 1, Level 10, 227 Elizabeth Street, Sydney NSW 2000
Contact Person	Laurent Stephane FRANCISCI, Operations Director, Mobile: [REDACTED] Email: [REDACTED]

NSF P/L confirms that it is a fit and proper person to hold a generation licence in the state of Victoria, and that:

- no directors of NSF P/L have been declared bankrupt or had their affairs placed under administration; been disqualified from managing a company; charged with fraud, theft or any other serious criminal offence;
- no prosecutions or regulatory complaints have been commenced against NSF P/L or any other company or person related to or associated with NSF P/L (including directors and senior management).

2.3 Corporate structure

Neoen SA (**Neoen**) is a French Independent Power Producer (IPP) – a developer, owner and operator of renewable energy projects. Headquartered in Paris, Neoen SA is also present in Australia, Portugal, Mexico, El Salvador, Egypt, the Caribbean, Africa and the Middle East. Globally, Neoen SA has over 1GW of renewable projects operating or under construction, and aims to reach 3GW globally by 2020.

Neoen SA set up its Australian subsidiary in 2012. Domestically, it has more than 1GW in operation or under construction, representing more than \$2 billion Australian dollars in investment.

Neoen Australia engages in specialised development, finance, operations and maintenance activities from its Australian offices with support from a team of executives and specialists based in Paris and other offices around the world. Please see Attachment 2.5 of this submission for more detail on key members of these international and local teams.

Neoen adheres to a ‘build, own and operate’ model. Consequently, it takes a long-term approach to its assets, to the local communities in which they are situated, and to Australian electricity markets overall.

Numurkah Solar Farm Pty Ltd is a wholly owned subsidiary of Numurkah FinCo Pty Ltd. This company provides the guarantee and security over its shares held in Numurkah Solar Farm Pty Ltd, its rights under relevant shareholder loans, and, in each case, limited recourse to the shared assets. Numurkah Solar Farm Pty Ltd provides security over all its assets.

Numurkah FinCo Pty Ltd is a wholly owned subsidiary of Numurkah HoldCo Pty Ltd, the holding company. Numurkah HoldCo Pty Ltd provided the funds from shareholder equity contributions and a junior loan to Numurkah Solar Farm Pty Ltd through Numurkah FinCo Pty Ltd.

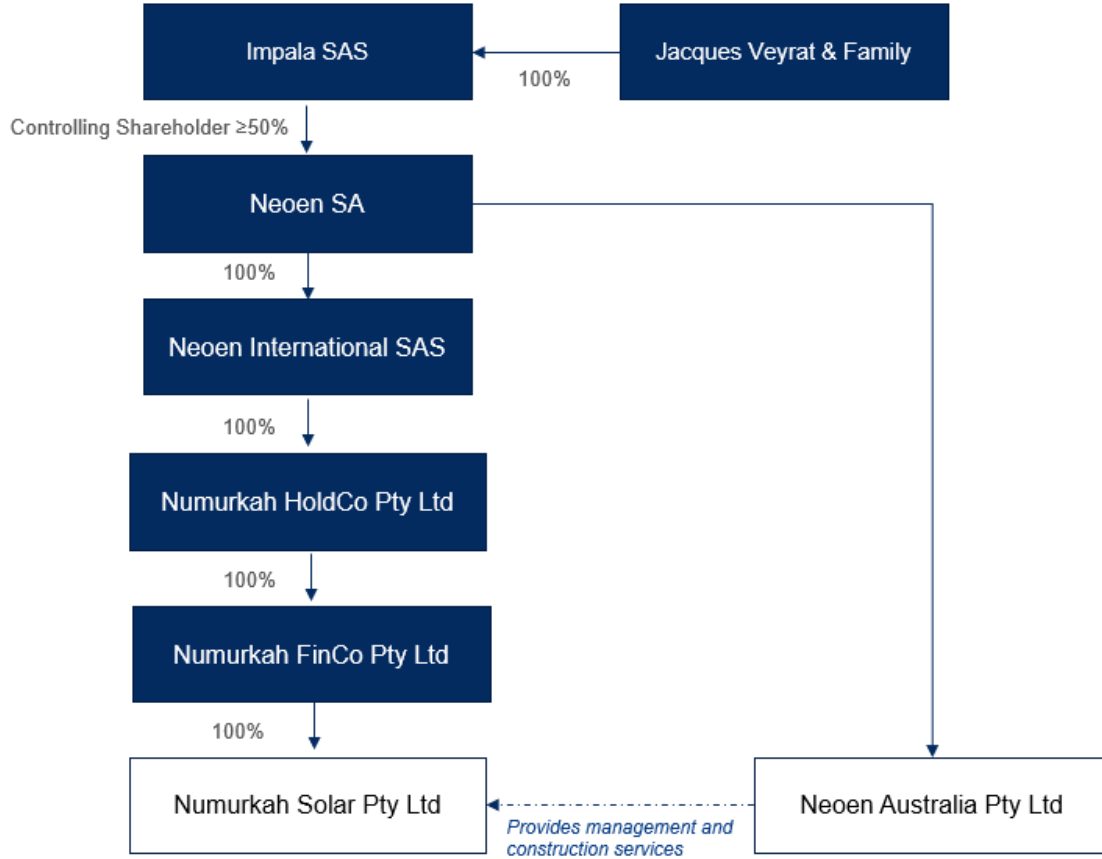
Numurkah Solar Farm Pty Ltd is the Special Purpose Vehicle that holds the assets of Numurkah Solar Farm and has entered into an asset management agreement with Neoen Australia Pty Ltd to provide asset management services.

Neoen Australia Pty Ltd is the developer of Numurkah Solar Farm.

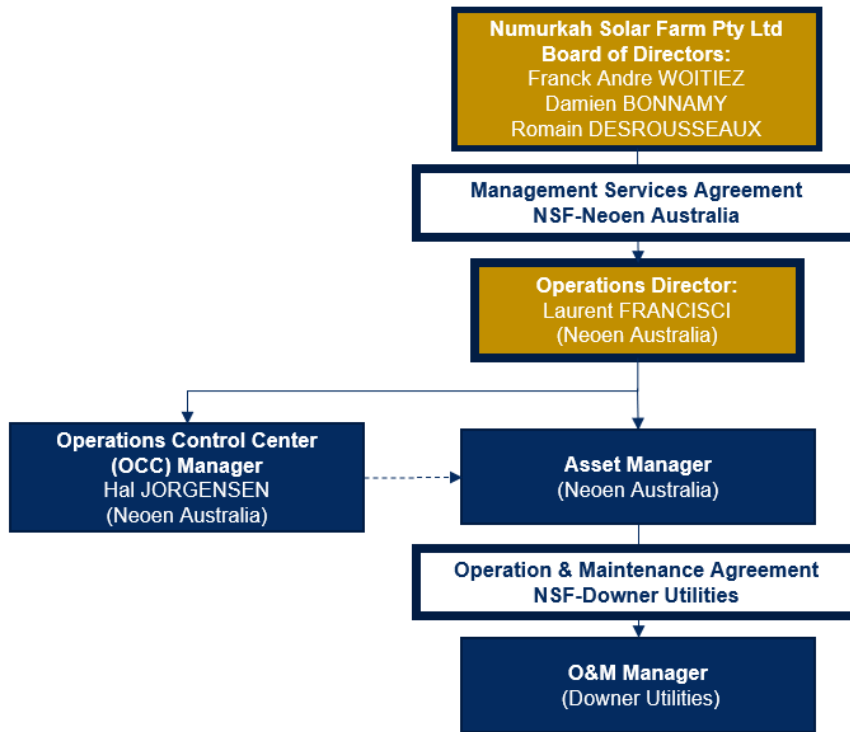
The ultimate holding company of both Neoen Australia Pty Ltd and Numurkah Solar Farm Pty Ltd is Neoen SA incorporated in France.

Neoen SA major shareholder is Impala which holds a controlling share. Certificates of the three Australian Companies are provided as an attachment

- Attachment 2.2.1 - Certificate of Registration Numurkah HoldCo Pty Ltd
- Attachment 2.2.2 - Certificate of Registration Numurkah FinCo Pty Ltd
- Attachment 2.2.3 - Certificate of Registration Numurkah Solar Farm Pty Ltd



2.4 Organisational Structure



2.5 Experience of the Key Personnel

NSF P/L is confident that Neoen has the expertise, knowledge and skill base to operate a solar farm successfully in the electricity industry of Victoria. As the owners and operators of the Numurkah Solar Farm, Neoen has a strong track record of successful operation of wind and solar farms across European, Central American and Australian markets. Neoen has an established track record of development and operation of renewable energy assets worldwide with significant expertise in operating wind and solar farms as well as large battery storage systems in Australia.

Neoen is the leading independent producer of exclusively renewable energy – solar, wind and storage – in Australia and France, and one of the most vibrant players in the industry worldwide. Founded in September 2008, the Company operates in Australia (where it is the leading renewable IPP), France, Portugal, Finland, Jamaica, Zambia, El Salvador, Mexico and Argentina and is involved in projects in Ireland, the USA, Mozambique etc. The Company aims to maintain at least 80% of its installed capacity in OECD countries. With around 2 GW currently in operation or under construction and another 1 GW already awarded, Neoen is pursuing its growth thanks to the vitality of its project development and the intrinsic competitiveness of its power plants. The company is widely acknowledged for its ability to innovate and deliver landmark projects. Neoen runs Europe’s most powerful solar PV installation, in Cestas, France (300 MW), and the world’s largest lithium-ion power reserve in South Australia (100 MW/129 MWh). Neoen’s rapidly expanding customer base includes states and public authorities, electricity markets and now major companies such as Google.

Since entry into the Australian renewable energy market in 2012 Neoen has developed and operates wind, battery and solar assets in NSW, Western Australia and South Australia.

Neoen is run by a stable and experienced management team. Its members share the same long-term vision, critical thinking and crystal-clear values (audacity, commitment, integrity and esprit de corps) that have shaped the group from the outset and guide its activities on a daily basis. With a close to 150-strong workforce comprising over 20 nationalities as of June 30, 2018, Neoen has the legitimacy, resources and expertise to support the Construction and Operation of the Numurkah Solar Farm.

Neoen Australia has been developing and operating generation assets within the NEM for several years. Short summaries of personnel in key roles to the operation of NSF are attached.

This team has supported the development, construction and operations of Neoen Australia's generation fleet and has sound knowledge of the generation industry in Australia. The fleet has grown to over 1GW of generation either operational or in construction since 2015.

The Group has shown that it can adapt to different and evolving market dynamics-while maintaining a prudent and rational business approach-in establishing its multi-local leadership. It operates in markets with different degrees of maturity, tailoring its development and operations to varying pricing, legal, administrative and tax structures. At the same time, it has strategically diversified its source of revenues by complementing public power purchase agreements (PPAs) with private off-take agreements and by opportunistically supplementing PPA revenues with merchant sales.

Neoen's approach to asset management is focused on operational excellence, actively supervising the construction and operation of its assets to target maximized power production and availability. From 2015 to 2017, the Group's solar assets achieved more than 99% average availability, generating 390 GWh of power in 2017, and its wind assets achieved more than 98% average availability (excluding a one-off event in 2017 relating to a substation issue at the Group's Osiere wind farm) over the same period, generating 930 GWh of power in 2017.

- Attachment 2.5 – Key Neoen Personnel Profiles

2.6 Details of Contracts

Neoen Australia manages Neoen's assets internally and has existing contracts in place for the provision of services to support this role.

NSF P/L holds EPC and O&M contracts with Downer Utilities for the construction, commissioning and long-term operation (20 years) of NSF.

The O&M Contract between NSF P/L and Downer Utilities provides the services associated with, but not limited to the physical operation and maintenance of the asset. The Construction, Operation and Maintenance Services Agreement between NSF P/L and Neoen Australia provides services associated with, but not limited to the management, contract administration and performance of the Principal's rights and obligations under the EPC Contract, Connection Agreements, O&M Contract, facility agreements, PPAs as well as ongoing compliance with relevant approvals and other reporting obligations.

NSF P/L confirms that all insurance policies required under the various project agreements have been (as required for the construction phase) or will be (as required for the operational phase of the project) put in place.

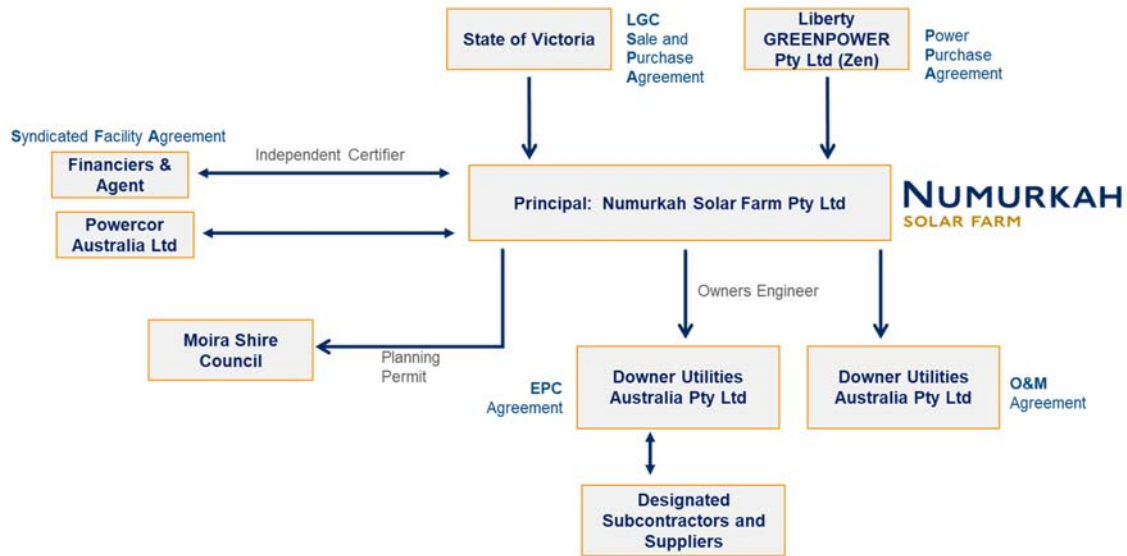
Additionally, NSF P/L holds a Negotiated Connection Agreement with Powercor for connection with the Network Service Provider's (NSP) 66kV distribution system. An annex to this agreement is a Customer Zone Substation Lease between NSF P/L and Powercor relating to Land described in Certificate of Title Volume 09425 Folio 751 for permitted use of a site for an electrical substation and for other purposes incidental to the receiving, distribution, transforming and supplying of electricity.

As owner of all land with respect to the solar farm and any other relevant assets, NSF P/L confirms that all land access arrangements are in place.

NSF P/L has entered into an electricity offtake agreement with Liberty GREENPOWER Pty Ltd and also a sale purchase agreement for Large Scale Renewable Generation Certificates (LGCs) with the State Government of Victoria.

The contracts are provided with this application, and can be found in the following attachments noting that all of these documents are commercial in confidence:

- Attachment 2.6.1 - Executed EPC Contract (commercial in confidence);
- Attachment 2.6.2 - Executed Operations and Maintenance Contract (commercial in confidence);
- Attachment 2.6.3 – Executed Powercor Negotiated Connection Agreement (commercial in confidence);
- Attachment 2.6.4 – Executed Powercor Generator Deed (commercial in confidence);
- Attachment 2.6.5 – Executed Liberty GREENPOWER Power Purchase Agreement (commercial in confidence);
- Attachment 2.6.6 – Executed Victorian Government LGC Sale & Purchase Agreement (commercial in confidence);
- Attachment 2.6.7 – Neoen Australia Construction, Operation and Maintenance Services Agreement (commercial in confidence);
- Attachment 2.6.8 – Neoen Australia Corporate and Management Services Agreement (commercial in confidence).



2.7 Type of licence sought

NSF P/L is seeking a full Victorian generation licence for 100MW from the Essential Services Commission of Victoria (**ESCV**) to operate in the National Electricity Market (NEM).

NSF will be connected to the electricity network via the Numurkah Solar Farm Substation being built within the solar farm. The substation is proposed to connect to the 66 kV transmission line between Shepparton Terminal Station (SHTS) and Numurkah zone substation (NKA). NSF is to be rated at 128 MW(dc) and is to comprise of 373,839 solar photovoltaic (PV) modules/panels and 56 x 2 MVA solar inverters.

The solar PV modules convert sunlight directly into DC electricity which is then converted into grid-compatible AC electricity that will be fed into the local distribution network.

Energy generation from NSF will be sold via offtake arrangements with customers and the electricity spot market in the National Electricity Market (**NEM**).

The registration as a generator in the NEM of the Numurkah Solar Farm project with AEMO is progressing well. The 5.3.4A letter with the negotiated performance standards was received on 5 July 2018.

The registration package was submitted to AEMO’s onboarding department on 12 November 2018. The process is ongoing as items continue to be addressed liaising with AEMO’s onboarding and technical teams as well as Powercor’s planning department. The aim is to achieve registration effective early March 2019, prior to energisation of the substation and subsequent generation of electricity.

NSF P/L seeks the Generation License issued as soon as possible and in any event by no later than February 2019 to be able to commence generation of the plant and complete live commissioning in March 2019.

The applicant is confident that NSF P/L has all necessary expertise at its disposal to comply with all relevant generation license conditions, codes and guidelines as detailed throughout this application and evidenced by Neoen’s generating fleet in Australia.

NSF P/L confirms that a Licenced Electrical Inspector, appropriately certified through Energy Safe Victoria (**ESV**), is required to sign the Certificate of Inspection within the Certificate of Electrical Safety certifying that the electrical installation work carried out (i.e. the solar farm) by licensed electrician meets all requirements of the applicable legislation and regulations (including under the Electrical Safety Act 1998 (Vic)). NSF P/L confirms that its construction and O&M contractor is engaging with ESV to confirm the extent of the obligations that NSF P/L is required to meet. A representative from ESV will be making a visit to the project in the near future and the ESV guidelines for “Who can work on large-scale solar farms” has been provided to the O&M Contractor. These guidelines reference legislative requirements cascading from the Electricity Safety Act 1998 (The Act) to the Electricity Safety (Registration and Licensing) Regulations 2010, Wiring Rules and Government Gazette G17 1999.

NSF P/L confirms it is not seeking any non-standard licence conditions.

- Attachment 2.7.1 5.3.4A Letter received from AEMO

- Attachment 2.7.2 AEMO Application Submitted

2.8 Licences held by associates of the applicant

Numurkah Solar Farm Pty Ltd does not currently hold any licences in Victoria, nor has it had any unsuccessful licence applications.

Neoen is present in 10 countries, with plants already operating, under construction or with financing underway. Neoen has 2GW in operation or under construction, all of Neoen’s assets hold the relevant licences, depending on the jurisdictions in which they are located.

Neoen currently holds existing Generating licences in South Australia through its wholly-owned subsidiaries:

- Electricity Generation Licence for the 100MW HWF1 Pty Ltd was granted on 12 May 2016.
- Electricity Generation Licence for the 100MW HWF2 Pty Ltd was granted on 1 February 2017.
- Electricity Generation Licence for the 100MW HWF3 Pty Ltd was granted on 11 August 2017.
- Electricity Generation Licence for the Hornsdale Power Reserve Pty Ltd was granted on 13 October 2017.

For details of experience of Generating Licences, refer to attachments:

- Attachment 2.8.1 - ESCOSA Electricity Generation Licence HWF 1;

- Attachment 2.8.2 - ESCOSA Electricity Generation Licence HWF 2;

- Attachment 2.8.3 - ESCOSA Electricity Generation Licence HWF 3;

- Attachment 2.8.4 - ESCOSA Electricity Generation Licence HPR.

3. Commissions Objectives

This application Part 2 sub-section 8(1) of the Essential Services Commission Act 2001 (ESC Act) sets the Objective of the Commission as follows:

1. *In performing its functions and exercising its powers, the objective of the commission is to promote the long-term interests of Victorian consumers.*
2. *In performing its functions and exercising its powers in relation to essential services, the Commission must in seeking to achieve the objectives have regard to the price, quality and reliability of essential services.*

The Numurkah Solar Farm project is underpinned by a contract with the Victorian Government, ensuring long term pricing stability for Victorian consumers. The inclusion of additional solar derived electricity into the Victorian grid provides additional diversity of supply as well as enhanced security to the network.

The Project also helps the Victorian Government meet its obligations under the VRET.

4. Information on Financial Viability

Neoen, as a financially viable entity, can meet and address the financial viability requirements of the generation licence. The following information is provided to the Commission on a commercial-in-confidence basis.

NSF P/L is a part of the Neoen Group which includes Neoen Australia, a large Australian based renewable energy developer, owner and operator with over 1GW of renewable projects already in operation or construction in Australia.

Funding for the Numurkah Solar Farm project is through a combination of project financing and equity.

Prudential requirements and associated credit support of the AEMO registration process will be met. Neoen Australia is currently operating a portfolio of almost 1GW of renewable generators that are all registered with AEMO and successfully provided sufficient financial resources.

The final version of the Financial Model projecting expected cash flow for the duration of the project is attached. This document underpins Neoen's investment in NSF, which highlights the robust economics of the project.

Financial documents are attached, with all attachments commercial in confidence.

- Attachment 4.1 – Numurkah Solar Farm Pty Ltd_Financial Report_Final
- Attachment 4.2 – Numurkah FinCo Pty Ltd_Financial Report_Final
- Attachment 4.3 – Numurkah HoldCo Pty Ltd_Financial Report_Final
- Attachment 4.4 - Numurkah Solar Farm Pty Ltd - Register of Members
- Attachment 4.5 - Numurkah FinCo Pty Ltd - Register of Members
- Attachment 4.6 - Numurkah HoldCo Pty Ltd - Register of Members

- Attachment 4.7 - Numurkah Solar Farm Pty Ltd – Share Certificate
- Attachment 4.8 - Numurkah FinCo Pty Ltd - Share Certificate
- Attachment 4.9 - Numurkah HoldCo Pty Ltd - Share Certificate
- Attachment 4.10 – Numurkah Solar Farm Financial Model/Business Plan
- Attachment 4.11 – EPC Advanced Payment Bank Guarantee
- Attachment 4.12 - EPC Bank Guarantees
- Attachment 4.13 Consolidated Financial Statement 2015, 2016 & 2017
- Attachment 4.14 Consolidated Financial Statement 2018

5. Information on Technical Capacity

Neoen Australia has the experience, knowledge and skill base to operate a viable generation business in Victoria.

Details of organisation structure and contacts with external providers are found in sections 2.4, 2.5 and 2.6 above.

5.1 Governance & Compliance

NSF P/L with the support of Neoen Australia, functions on internal rules and procedures to ensure compliance with the organisational needs, functions and targets. Neoen has drawn up a Code of Conduct with a view to promoting and reinforcing ethical and responsible behaviour among employees, including consultants and interns. Neoen wishes to ensure that all of its employees behave in accordance with this code and generally adopt an exemplary standard of behaviour in the performance of their professional activities.

- Attachment 5.1.1a Neoen Code of Conduct

Internal controls, policies and procedures

Neoen has implemented an internal control system on the global level to ensure the reliability of its accounting and financial information, to ensure compliance with applicable laws and regulations and the effectiveness of transactions. It is mainly based on a culture of proper internal controls, dedicated control activities and active management of the internal control system.

The culture of internal controls is based, on Neoen's corporate culture. Neoen has defined and implemented a charter of ethics and maintains a managerial culture that is sensitive to risk management.

Control activities have been defined for ten major processes that have been identified by Neoen, whether operational, support or cross-functional. For each of them, control activities have been identified and circulated through "control matrices". The control activities were defined according to the operational risks identified in each process and those identified in Neoen's risk mapping. They have been detailed and explained to facilitate their implementation by all group subsidiaries. In

addition to this organisation, a set of concrete tools (checklist, document templates, etc.) has been designed and circulated throughout the group for a better assimilation and implementation of these control activities, on a uniform basis across Neoen's locations.

In addition, the implementation of the internal control system is evaluated during annual internal control self-assessment campaigns, the first of which was launched in 2017. Each manager assesses, within his area of responsibility, the effectiveness of the internal control activities established by Neoen. This process enables the evaluation of the level of internal control deployment within Neoen, as well as the creation of action plans aimed at reinforcing activities that are currently not subject to sufficiently strong internal controls.

Relevant “control matrices” which describe the best internal control practices for main process risk, be it operational or financial risks are included along with relevant policies and documentation listed below:

- Attachment 5.1.2 Asset Management Internal Control Matrix

Health, Safety & Environment

Once the facility begins operating, the monitoring of HSE compliance is delegated to the service provider that ensures the maintenance of the facility (the O&M provider), which is usually the EPC contractor, in coordination with the relevant Neoen asset manager. HSE reporting to Neoen is done on a monthly basis and focuses on workplace accidents and environmental damage as well as the implementation of the rules applicable to the facility. All of Neoen's HSE management systems are implemented using OHSAS 18001 and ISO 14001 guidelines.

- Attachment 5.1.3 Neoen HSE Management System & Policy

Human Resources

Neoen highly values its human capital, which represents one of its core assets, and seeks to promote the development of skills among its employees, namely by giving them new positions and experiences within Neoen's various subsidiaries.

As part of its hiring, Neoen promotes diversity among its employees, as reflected by the composition of its staff, which includes employees from significantly varied backgrounds and of more than 20 nationalities.

Training provided by Neoen relates primarily to the following fields: safety (in particular, training in order to obtain height-clearance and electrical-clearance), training for workplace adaptation in order to help employees adapt to new tools (such as training for new accounting or invoice validation tools) and skill development training, such as language training.

Risk management

Neoen's risk management relates to measures implemented to assess, analyse and manage the risks to which it is subject in the course of its business worldwide. Neoen places great importance on a proper risk culture and has taken a structured approach to carry out active risk management policies to ensure that its major and operational risks are recognized and managed. The risk management system that it has implemented is applicable to the entire group, including all of its activities, functions and locations.

Risk management is a priority for Neoen, and it has established a consistent approach to risk management and internal controls. Neoen's risk management and internal control systems are based on a set of methods, policies, procedures, behaviours and actions that aim to ensure that the necessary measures are taken to:

- verify the effectiveness of transactions and an efficient use of resources; and
- identify, analyse and manage risks that are likely to have a significant impact on Neoen's assets, results, transactions and achievements of its objectives, whether operational, commercial, legal or financial, including those relating to compliance with applicable laws and regulations.

An appropriate risk management approach and structuring tools have been established to support internal systems at every level of Neoen's organisation.

The local organisation, selected contractors and consultants ensure that NSF P/L enjoys exemplary market knowledge to manage all possible risks related to financing, constructing, operating and maintaining a solar farm of this scale.

NSF P/L, through its parent entities utilises corporate risk management processes as an integral part of the normal operation of its businesses.

The NSF-specific risk management plan and risk register were compiled during the development phase of the project and is subject to regular reviews as the project transitions to construction and operations phases. The NSF risk management plan and associated risk are attached to the application:

- Attachment 5.1.4 NSF Risk Management Plan

- Attachment 5.1.5 NSF Risk Register

Technical and Regulatory Compliance

NSF P/L has a project management team, backed-up by external consultants/contractors to oversee the construction of the facility and the ongoing operation and maintenance activities.

Neoen's 24/7 Operations Control Centre (OCC) and dedicated Asset Manager are located in Canberra and will have responsibility for:

- monitoring the good operation and maintenance of the asset on a day to day basis;
- managing relationship with AEMO, compliance with the NER, collecting settlements and accordingly preparing monthly reports to offtakers in order to offset differences between Market sales and PPA price for the applicable dispatched quantities;
- being the primary contact of the network service provider (NSP) and AEMO for operation of the asset (e.g. switching instructions, compliance or any relevant queries);
- being the primary contact of various stakeholders to ensure continuing compliance of the asset with agreements in place (approval conditions, environmental, cultural heritage, etc.).

In accordance with the requirements of the National Electricity Rules, NSF P/L has applied for registration with AEMO as a market generator (semi-scheduled market participant).

- Attachment 5.1.6 Neoen Revenue Management RACI & Trading Workflows

- Attachment 5.1.7 NSF Business Continuity Plan

Community Engagement & Complaints Register

A process for ongoing community engagement and management of complaints is in place for NSF in addition to the dedicated project website (<https://numurkajsolarfarm.com.au/>) which includes a feedback function and dedicated project phone number.

Details of all complaints received will be recorded in an up-to-date Complaints Register (attached). The register records all of the critical information of the complaint and details corrective actions, follows-ups and tracks satisfaction and closure of issues.

- Attachment 5.1.8 Neoen Community Engagement Policy
- Attachment 5.1.9 NSF Complaints Register

6. Consolidated List of Attachments

- Attachment 2.1 Numurkah Solar Farm Amended Planning Permit, Moira Shire Council
- Attachment 2.2.1 - Certificate of Registration Numurkah HoldCo Pty Ltd
- Attachment 2.2.2 - Certificate of Registration Numurkah FinCo Pty Ltd
- Attachment 2.2.3 - Certificate of Registration Numurkah Solar Farm Pty Ltd
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- Attachment 4.14 Consolidated Financial Statement 2018
- Attachment 5.1.1a Neoen Code of Conduct
- Attachment 5.1.2 Asset Management Internal Control Matrix
- Attachment 5.1.3 Neoen HSE Management System & Policy
- Attachment 5.1.4 NSF Risk Management Plan
- Attachment 5.1.5 NSF Risk Register
- Attachment 5.1.6 Neoen Revenue Management RACI & Trading Workflows
- Attachment 5.1.7 NSF Business Continuity Plan
- Attachment 5.1.8 Neoen Community Engagement Policy
- Attachment 5.1.9 NSF Complaints Register
- Attachment 6.1 NSF Compliance Obligations Register

- Attachment 6.2 Neoen Australia Document Retention Policy